

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington

April 1, 2021

WILLIAM M. McCOOL, Clerk

By  Deputy

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. CR20-092 JCC

**SECOND SUPERSEDING
INDICTMENT**

- (1) ALAN GOMEZ-MARENTES (aka
GUAJAS),
- (2) JUAN ANTONIO GONZALEZ-
CARRILLO (aka TOTO),
- (3) LUIS ARTURO MAGANA-
RAMIREZ (aka GUERO),
- (4) JOSE ELIAS BARBOSA (aka PRIMO,
aka PRIETO),
- (5) JOSE DANIEL ESPINOZA (aka
APACHE),
- (6) ESTEFHANY COREA-MENDOZA
(aka SICARIA),
- (7) ADRIAN IZAZAGA-MARTINEZ,
- (8) JORGE MONDRAGON,
- (9) BENJAMIN FUENTES (aka
CHANCHAS),
- (10) LUIS ZAVALZA-SANCHEZ (aka
FLAKO),
- (11) ALYSHA JONES (aka MANDY),
- (12) ARMANDO FIERRO-PONCE,
- (13) AMANDA MEYER,
- (14) MICHAEL ANDREW WOOD,
- (15) LUIS CASTILLO-BARRAGAN,
- (16) EFRAIN LUNA-RODRIGUEZ,

SECOND SUPERSEDING INDICTMENT

United States v. Alan GOMEZ-MARENTES, et al. - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

(17) JULIAN PINEDA CASILLAS,
(18) BLANCA MEDINA,
(19) RUTH MELISA GOMEZ-
MARENTES,
(20) ADRIAN SIMS, and
(21) EDGAR LUNA-GARCIA,

Defendants.

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown and continuing until on or about July 28, 2020, at King, Pierce, and Kitsap Counties, within the Western District of Washington, and elsewhere, ALAN GOMEZ-MARENTES, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS, BLANCA MEDINA, RUTH MELISA GOMEZ-MARENTES, ADRIAN SIMS, EDGAR LUNA-GARCIA, and others known and unknown, did knowingly and intentionally conspire to distribute substances controlled under Title 21, United States Code, Section 812, Schedules I and II, to wit: methamphetamine, heroin, and Fentanyl, contrary to the provisions of Title 21, United States Code.

Specific Quantity Allegations as to Methamphetamine

The Grand Jury further alleges that with respect to ALAN GOMEZ-MARENTES, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN

1 FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-
 2 PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-
 3 BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS,
 4 BLANCA MEDINA, RUTH MELISA GOMEZ-MARENTES, and EDGAR LUNA-
 5 GARCIA, their conduct as members of the conspiracy charged in Count 1, which
 6 includes the reasonably foreseeable conduct of the other members of the conspiracy
 7 charged in Count 1, involved 50 grams or more of methamphetamine, its salts, isomers,
 8 and salts of its isomers, and 500 grams or more of a mixture or substance containing a
 9 detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in
 10 violation of Title 21, United States Code, Section 841(b)(1)(A).

11 The Grand Jury further alleges that with respect to ADRIAN SIMS, his conduct as
 12 a member of the conspiracy charged in Count 1, which includes the reasonably
 13 foreseeable conduct of the other members of the conspiracy charged in Count 1, involved
 14 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 50
 15 grams or more of a mixture or substance containing a detectable amount of
 16 methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21,
 17 United States Code, Section 841(b)(1)(B).

18 *Specific Quantity Allegations as to Heroin*

19 The Grand Jury further alleges that with respect to ALAN GOMEZ-MARENTES,
 20 JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ,
 21 JOSE DANIEL ESPINOZA, JULIAN PINEDA CASILLAS, and BLANCA MEDINA,
 22 their conduct as members of the conspiracy charged in Count 1, which includes the
 23 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 24 involved 1 kilogram or more of a mixture or substance containing a detectable amount of
 25 heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

26 The Grand Jury further alleges that with respect to JOSE ELIAS BARBOSA,
 27 ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE
 28 MONDRAGON, BENJAMIN FUENTES, AMANDA MEYER, and ADRIAN SIMS,

1 their conduct as members of the conspiracy charged in Count 1, which includes the
 2 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 3 involved 100 grams or more of a mixture or substance containing a detectable amount of
 4 heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

5 ***Specific Quantity Allegations as to Fentanyl***

6 The Grand Jury further alleges that this with respect to ALAN GOMEZ-
 7 MARENTES, LUIS ARTURO MAGANA-RAMIREZ, JOSE DANIEL ESPINOZA,
 8 BENJAMIN FUENTES, and EFRAIN LUNA-RODRIGUEZ, their conduct as members
 9 of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct
 10 of other members of the conspiracy charged in Count 1, involved 400 grams or more of a
 11 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
 12 4-piperidinyl] propanamide (Fentanyl), and 100 grams or more of any analogue of N-
 13 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), in violation of Title
 14 21, United States Code, Section 841(b)(1)(A).

15 The Grand Jury further alleges that with respect to LUIS CASTILLO-
 16 BARRAGAN and RUTH MELISA GOMEZ-MARENTES, their conduct as members of
 17 the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of
 18 other members of the conspiracy charged in Count 1, involved 40 grams or more of a
 19 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
 20 4-piperidinyl] propanamide (Fentanyl), and 10 grams or more of any analogue of N-
 21 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), in violation of Title
 22 21, United States Code, Section 841(b)(1)(B).

23 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and
 24 846.

25 **COUNT 2**

26 **(Possession with Intent to Distribute – Methamphetamine)**

27 On or about November 9, 2019, at King and Kitsap Counties, within the Western
 28 District of Washington, ALAN GOMEZ-MARENTES, JOSE ELIAS BARBOSA,

1 ALYSHA JONES, RUTH MELISA GOMEZ-MARENTES, and EDGAR LUNA-
2 GARCIA, did knowingly and intentionally possess with the intent to distribute, and aid
3 and abet the possession of with intent to distribute, methamphetamine, a substance
4 controlled under Title 21, United States Code, Section 812.

5 The Grand Jury further alleges that this offense involved 50 grams or more of
6 methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a
7 mixture or substance containing a detectable amount of methamphetamine, its salts,
8 isomers, and salts of its isomers.

9 The Grand Jury further alleges that this offense was committed during and in
10 furtherance of the conspiracy charged in Count 1, above.

11 All in violation of Title 21, United States Code, Sections 841(a)(1) and
12 841(b)(1)(A), and Title 18, United States Code, Section 2.

13 **COUNT 3**

14 **(Attempted Possession with Intent to Distribute – Methamphetamine and Heroin)**

15 On or about June 5, 2020, at Pierce County, within the Western District of
16 Washington and elsewhere, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS
17 ARTURO MAGANA-RAMIREZ, and JULIAN PINEDA CASILLAS did knowingly
18 and intentionally attempt to possess with the intent to distribute, and aid and abet the
19 attempted possession with intent to distribute, methamphetamine and heroin, a substance
20 controlled under Title 21, United States Code, Section 812.

21 The Grand Jury further alleges that with respect to LUIS ARTURO MAGANA-
22 RAMIREZ and JULIAN PINEDA CASILLAS, this offense involved 50 grams or more
23 of methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more
24 of a mixture or substance containing a detectable amount of methamphetamine, its salts,
25 isomers, and salts of its isomers, in violation of Title 21, United States Code, Section
26 841(b)(1)(A).

27 The Grand Jury further alleges that with respect to JUAN ANTONIO
28 GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, and JULIAN

PINEDA CASILLAS, this offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 846, and Title 18, United States Code, Section 2.

COUNT 4

(Conspiracy to Commit Money Laundering)

Beginning at a time unknown, but within the last five years, and continuing through July 28, 2020, in King County, within the Western District of Washington, and elsewhere, ALAN GOMEZ-MARENTES and RUTH GOMEZ-MARENTES, and others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit certain money laundering offenses under Title 18, United States Code, Section 1956, as follows:

1956(a)(1)(B)(i)

Did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

1956(a)(1)(B)(ii)

Did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is,

1 conspiracy to distribute controlled substances, in violation of Title 21, United States
2 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or
3 in part to avoid a transaction reporting requirement under State and Federal Law, in
4 violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

5 The Grand Jury further alleges this offense was committed during and in
6 furtherance of the conspiracy charged in Count 1, above.

7 All in violation of Title 18, United States Code, Section 1956(h).

8 **COUNT 5**

9 **(Possession with Intent to Distribute – Methamphetamine and Heroin)**

10 On or about July 28, 2020, at King County, within the Western District of
11 Washington, ALAN GOMEZ-MARENTES and BLANCA MEDINA, did knowingly and
12 intentionally possess with the intent to distribute, and aid and abet the possession of with
13 intent to distribute, methamphetamine and heroin, substances controlled under Title 21,
14 United States Code, Section 812.

15 The Grand Jury further alleges that this offense involved 50 grams or more of
16 methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a
17 mixture or substance containing a detectable amount of methamphetamine, its salts,
18 isomers, and salts of its isomers.

19 The Grand Jury further alleges that this offense involved 1 kilogram or more of a
20 mixture or substance containing a detectable amount of heroin.

21 The Grand Jury further alleges that this offense was committed during and in
22 furtherance of the conspiracy charged in Count 1, above.

23 All in violation of Title 21, United States Code, Sections 841(a)(1) and
24 841(b)(1)(A), and Title 18, United States Code, Section 2.

25 **COUNT 6**

26 **(Possession with Intent to Distribute – Methamphetamine, Heroin,
27 Fentanyl, and Cocaine)**

28 On or about July 28, 2020, at King County, within the Western District of
Washington, JOSE DANIEL ESPINOZA and BENJAMIN FUENTES, did knowingly

1 and intentionally possess with the intent to distribute, and aid and abet the possession of
 2 with intent to distribute, methamphetamine, heroin, Fentanyl, and cocaine, all substances
 3 controlled under Title 21, United States Code, Section 812.

4 The Grand Jury further alleges that this offense involved 50 grams or more of
 5 methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a
 6 mixture or substance containing a detectable amount of methamphetamine, its salts,
 7 isomers, and salts of its isomers.

8 The Grand Jury further alleges that this offense involved 100 grams or more of a
 9 mixture or substance containing a detectable amount of heroin.

10 The Grand Jury further alleges that this offense involved 40 grams or more of a
 11 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
 12 4-piperidinyl] propanamide (Fentanyl), and 10 grams or more of any analogue of N-
 13 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl).

14 The Grand Jury further alleges that this offense was committed during and in
 15 furtherance of the conspiracy charged in Count 1, above.

16 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
 17 841(b)(1)(B), 841(b)(1)(C), and Title 18, United States Code, Section 2.

18 COUNT 7

19 **(Possession with Intent to Distribute – Fentanyl)**

20 On or about July 28, 2020, at King County, within the Western District of
 21 Washington, AMANDA MEYER, did knowingly and intentionally possess with the
 22 intent to distribute, and aid and abet the possession of with intent to distribute, Fentanyl, a
 23 substance controlled under Title 21, United States Code, Section 812.

24 The Grand Jury further alleges that this offense involved 40 grams or more of a
 25 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
 26 4-piperidinyl] propanamide (Fentanyl), and 10 grams or more of any analogue of N-
 27 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl).
 28

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),
4 and Title 18, United States Code, Section 2.

5 **COUNT 8**

6 **(Possession with Intent to Distribute – Methamphetamine and Fentanyl)**

7 On or about July 28, 2020, at King County, within the Western District of
8 Washington, ADRIAN SIMS did knowingly and intentionally possess with the intent to
9 distribute, and aid and abet the possession of with intent to distribute, controlled
10 substances, including but not limited to methamphetamine and Fentanyl, a substance
11 controlled under Title 21, United States Code, Section 812.

12 The Grand Jury further alleges that this offense involved 5 grams or more of
13 methamphetamine, its salts, isomers, and salts of its isomers, and 50 grams or more of a
14 mixture or substance containing a detectable amount of methamphetamine, its salts,
15 isomers, and salts of its isomers.

16 The Grand Jury further alleges that this offense was committed during and in
17 furtherance of the conspiracy charged in Count 1, above.

18 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B),
19 841(b)(1)(C), and Title 18, United States Code, Section 2.

20 **COUNT 9**

21 **(Illegal Alien in Possession of a Firearm and Ammunition)**

22 On or about July 28, 2020, at Pierce County, within the Western District of
23 Washington, LUIS ARTURO MAGANA-RAMIREZ, knowing himself to be an alien
24 illegally and unlawfully in the United States, did knowingly possess, in and affecting
25 interstate and foreign commerce, a firearm and ammunition, to wit:

- 26 • *a Thompson Center Arms, Contender, Colt 45 pistol;*
- 27 • *a Raven Arms, P-25, .25 Auto, pistol;*
- 28 • *10 rounds of .40 caliber ammunition made by Poongsan Corporation;*

- 10 rounds of 10mm caliber ammunition made by Prvi Partizan;
- 13 rounds of 9mm caliber ammunition made by Federal Cartridge Company;
- 1 round of 9mm caliber ammunition made by CCI;
- 40 rounds of .22 caliber ammunition made by Federal Cartridge Company; and
- 50 rounds of .22 caliber ammunition made by Cartuchos Desportivos de Mexico;

which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(5)(A).

COUNT 10

(Possession of an Unregistered Firearm)

On or about July 28, 2020, at King County, within the Western District of Washington, JOSE DANIEL ESPINOZA, knowingly received and possessed a firearm, to wit, *a Winchester, Model 12 Shotgun, 12 gauge*, which had a barrel length of less than 18 inches, and was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

COUNT 11

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about July 28, 2020, in King County, within the Western District of Washington, AMANDA MEYER knowingly and intentionally possessed a firearm, to wit, *a privately manufactured 9mm handgun*, in furtherance of a drug trafficking offense for which she may be prosecuted in a Court of the United States, to wit, *Conspiracy to Distribute Controlled Substances*, as charged in Count 1, and *Possession with Intent to Distribute – Fentanyl* as Charged in Count 7, of this Superseding Indictment.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

1 All in violation of Title 18, United States Code, Section 924(c)(1)(A).

2 **COUNT 12**

3 **(Felon in Possession of Ammunition – Vehicle)**

4 On or about July 28, 2020, in King County, within the Western District of
5 Washington, ADRIAN SIMS, knowing he had previously been convicted of crimes
6 punishable by imprisonment for a term exceeding one year, to wit:

- 7 • *Protection Order Violation, Domestic Violence*, under cause number 17-1-
8 03952-9, in Pierce County Superior Court, on or about May 25, 2018 (two
9 counts),

10 did knowingly possess, and did aid and abet the possession of, ammunition, to wit: 28
11 rounds of 9mm caliber ammunition made by Federal Cartridge Company, which had
12 previously traveled in interstate and foreign commerce.

13 All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2),
14 and 2.

15 **COUNT 13**

16 **(Felon in Possession of a Firearm– Storage Unit)**

17 On or about July 28, 2020, in King County, within the Western District of
18 Washington, ADRIAN SIMS, knowing he had previously been convicted of crimes
19 punishable by imprisonment for a term exceeding one year, to wit:

- 20 • *Protection Order Violation, Domestic Violence*, under cause number 17-1-
21 03952-9, in Pierce County Superior Court, on or about May 25, 2018 (two
22 counts),

23 did knowingly possess, and did aid and abet the possession of, a firearm, to wit:

- 24 • *a Rock River Arms, Model LAR-15, 5.56mm, rifle; and*
25 • *a Lee-Enfield, Model 4, 303 caliber, rifle;*

26 which had previously traveled in interstate and foreign commerce.

27 All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2),
28 and 2.

ASSET FORFEITURE ALLEGATIONS

Drug Offenses

The allegations in Counts 1 through 3, and 5 through 8, of this Superseding Indictment are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of the felony drug offenses charged in Counts 1 through 3, and 5 through 8, of this Superseding Indictment, defendants ALAN GOMEZ-MARENTES, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS, BLANCA MEDINA, RUTH MELISA GOMEZ-MARENTES, ADRIAN SIMS, and EDGAR LUNA-GARCIA, shall forfeit to the United States of America any and all property, real or personal, constituting or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such offenses, and shall further forfeit any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. The property to be forfeited includes, but is not limited to, the following:

a. Four thousand one hundred U.S. Dollars (\$4,100.00), more or less, seized from the person of MICHAEL ANDREW WOOD on April 22, 2020;

b. Bulk cash seized from the primary residence of ALAN GOMEZ-MARENTES and BLANCA MEDINA at 229 Andover Park East, Apartment 1612, Tukwila, Washington, on July 28, 2020;

c. Bulk cash seized from the alternate residence of BLANCA MEDINA at 3511 Gibson Road #B, El Monte, California, on July 28, 2020;

1 d. Bulk cash seized from the primary residence of LUIS ARTURO
2 MAGANA-RAMIREZ at 4503 67th Avenue East, Fife, Washington, on July 28, 2020;

3 e. Bulk cash seized from the primary residence of JOSE DANIEL
4 ESPINOZA and BENJAMIN FUENTES at 430 Maple Avenue Southwest, Renton,
Washington, on July 28, 2020; and

5 f. Sums of money representing the proceeds that each defendant
6 obtained as a result of the Conspiracy to Distribute Controlled Substances, as alleged in
7 Count 1, above.

8 ***Money Laundering Offenses***

9 The allegations in Count 4 of this Superseding Indictment are hereby realleged and
10 incorporated by reference herein for the purposes of alleging forfeiture to the United
11 States pursuant to Title 18, United States Code, Section 982(a)(1).

12 Upon conviction of the felony offense in violation of Title 18, United States Code,
13 Sections 1956, as charged in Count 4 of this Superseding Indictment, defendants ALAN
14 GOMEZ-MARENTES and RUTH GOMEZ-MARENTES, shall forfeit to the United
15 States of America any property, real or personal, involved in such offense, and any
16 property traceable to such property, including but not limited to the following,

17 a. A sum of money representing any property, real or personal,
18 involved in the offense charged in Count 4 of this Superseding Indictment, and any
19 property traceable to such property.

20 ***Firearms Offenses***

21 Pursuant to Title 18, United States Code, Section 924(d)(1), Title 26, United States
22 Code, Section 5872, and Title 28, United States Code, Section 2461(c), upon conviction
23 of any of the offenses alleged in Counts 9 through 13 of this Superseding Indictment,
24 defendants LUIS ARTURO MAGANA-RAMIREZ, JOSE DANIEL ESPINOZA,
25 AMANDA MEYER, and ADRIAN SIMS, shall forfeit to the United States any firearms
26 and ammunition involved or used in committing the offenses alleged in Counts 9 through
27 13 of this Superseding Indictment, including but not limited to the following:
28

1 a. *a Thompson Center Arms, Contender, Colt 45 pistol*, seized from the
 2 residence of LUIS ARTURO MAGANA-RAMIREZ at 4503 67th Avenue East, Fife,
 3 Washington, on July 28, 2020;

4 b. *a Raven Arms, P-25, .25 Auto, pistol*, seized from the residence of
 5 LUIS ARTURO MAGANA-RAMIREZ at 4503 67th Avenue East, Fife, Washington, on
 6 July 28, 2020;

7 c. *10 rounds of .40 caliber ammunition made by Poongsan*
 8 *Corporation*, seized from the residence of LUIS ARTURO MAGANA-RAMIREZ at
 9 4503 67th Avenue East, Fife, Washington, on July 28, 2020;

10 d. *10 rounds of 10mm caliber ammunition made by Prvi Partizan*,
 11 seized from the residence of LUIS ARTURO MAGANA-RAMIREZ at 4503 67th
 12 Avenue East, Fife, Washington, on July 28, 2020;

13 e. *13 rounds of 9mm caliber ammunition made by Federal Cartridge*
 14 *Company*, seized from the residence of LUIS ARTURO MAGANA-RAMIREZ at 4503
 15 67th Avenue East, Fife, Washington, on July 28, 2020;

16 f. *1 round of 9mm caliber ammunition made by CCI*, seized from the
 17 residence of LUIS ARTURO MAGANA-RAMIREZ at 4503 67th Avenue East, Fife,
 18 Washington, on July 28, 2020;

19 g. *40 rounds of .22 caliber ammunition made by Federal Cartridge*
 20 *Company*, seized from the residence of LUIS ARTURO MAGANA-RAMIREZ at 4503
 21 67th Avenue East, Fife, Washington, on July 28, 2020;

22 h. *50 rounds of .22 caliber ammunition made by Cartuchos*
 23 *Desportivos de Mexico*, seized from the residence of LUIS ARTURO MAGANA-
 24 RAMIREZ at 4503 67th Avenue East, Fife, Washington, on July 28, 2020;

25 i. *a Winchester, Model 12 Shotgun, 12 gauge*, seized from the primary
 26 residence of JOSE DANIEL ESPINOZA at 430 Maple Avenue Southwest, Renton,
 27 Washington, on July 28, 2020;

28 j. *a privately manufactured 9mm handgun*, seized from the primary
 residence of AMANDA MEYER at 11413 Southeast 219th Place, Kent, Washington, on
 July 28, 2020;

1
2 k. 28 rounds of 9mm caliber ammunition made by Federal Cartridge
3 Company, seized from the vehicle of ADRIAN SIMS in Auburn, Washington, on July
4 28, 2020;

5 1. a Rock River Arms, Model LAR-15, 5.56mm, rifle, seized from the
6 storage unit of ADRIAN SIMS at Unit G-35 at Public Storage, 10528 Southeast 256th
7 Street, Kent, Washington, on July 28, 2020; and

8 m. a Lee-Enfield, Model 4, 303 caliber, rifle, seized from the storage
9 unit of ADRIAN SIMS at Unit G-35 at Public Storage, 10528 Southeast 256th Street,
10 Kent, Washington, on July 28, 2020.

11 ***Substitute Assets***

12 If any of the property described above, as a result of any act or omission of the
13 defendants:

- 14 a. cannot be located upon the exercise of due diligence;
- 15 b. has been transferred or sold to, or deposited with, a third party;
- 16 c. has been placed beyond the jurisdiction of the Court;
- 17 d. has been diminished in value; or
- 18 e. has been commingled with other property which cannot be divided without
19 difficulty,

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1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p), to seek the forfeiture of any other property of the defendants up to the value of
3 the above-described forfeitable property.

4
5 A TRUE BILL:

6 DATED: 3/31/21

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8 *(Signature of Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States)*

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FOREPERSON

TESSA M. GORMAN
Acting United States Attorney

VINCE LOMBARDI
Assistant United States Attorney

AMY JAQUETTE
Assistant United States Attorney

C. ANDREW COLASURDO
Assistant United States Attorney